

AFFIDAVIT OF RANOLDO BALFOUR

I swear that the forgoing is true and correct to the best of my memory:

1. My name is Ranoldo Balfour. I was detained in the Butler County Jail from around October 2019 to May of 2020.
2. I was in C-block, where immigrants were housed.
3. During my time in BCJ, I noticed that African immigrants were being treated differently by the COs, and I made a complaint. A CO who was working overheard this, and informed the other COs, who all began to harass me.
4. My initial cellmate was another man from Africa. After I made the complaint, the COs replaced him with a man from Mexico, who said that he did not want to be in the same cell as a black person. He referred to black people as “monkeys” and talked openly to others about how he did not want to share a cell with me.
5. One night, I was watching television, and my cellmate began complaining again, and stated that he did not want to watch television with a black person. I asked the CO on duty if we could be separated, but he refused. The next morning, my cellmate spit in my cup after breakfast.
6. The Mexican inmate lied to the COs and said that I had made a pencil into a shank and threatened him with it. Six COs came into my cell, pulled me down from the top bunk, and began severely beating me. My face and nose began bleeding, and there was blood on my uniform.
7. Other inmates who saw this told the COs that I did not have a pencil shank and did not threaten my cellmate, but the COs ignored them and continued to beat me.

8. The COs searched my bunk and did not find anything. They still put me in isolation.
9. Afterwards, the COs laughed about beating me.
10. Even though I did not have a shank, the COs told the immigration judge that I had threatened to kill my cellmate. Even the judge questioned why they would house two people in one cell when they clearly did not want to be together.
11. COs at BCJ frequently beat up black inmates, especially those who knew English well. They knew we could not defend ourselves, and they would regularly try to provoke inmates with threats or racist language, and then beat us if we responded in any way they thought was “disrespectful.”
12. COs would tell us that they would make sure we would be deported and would not get any bond.
13. The COs acted as a gang against inmates. If an inmate made a complaint about one, a group would enter the inmate’s cell and beat him, or provoke him to retaliate so they could lock him up in isolation.
14. The COs often beat inmates and then laughed about it afterwards. Groups of COs would gang up against single inmates to beat them.
15. COs regularly used racist language towards us.
16. COs frequently turned the heat off and made us stay in the cold. They provided us with expired food that made people physically sick.
17. No CO ever attempted to get another CO to stop the verbal or physical abuse.
18. No superior ever stepped in to fix the situation and abuses, despite reports and complaints.

I swear that the above is true and correct to the best of my memory.

A handwritten signature in dark ink, appearing to be 'Ranoldo Balfour', written over a light blue rectangular background.

Ranoldo Balfour

05/06/2023

Date